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February 22, 2021

REQUEST GRANTED.
Schedule Approved.

VIA CM-ECF

Hon. Lewis J. Liman
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

2/23/2021 SO ORDERED.

A handwritten signature in black ink, appearing to read "L. Liman", is written over a horizontal line. Below the line, the text "LEWIS J. LIMAN" and "United States District Judge" is printed in a small, sans-serif font.

LEWIS J. LIMAN
United States District Judge

Re: *United States v. Huberfeld* (1:16-cr-00467-LJL)

Dear Judge Liman:

Dechert LLP, along with Meister Seelig & Fein LLP, represents Murray Huberfeld in the above-captioned matter. We write respectfully to request an extension of the filing deadlines relating to Mr. Huberfeld's April 26, 2021, sentencing hearing in light of the updated estimated time of completion for the presentence report.

At present, the Parties' objections to the PSR and sentencing submissions are due by March 2, and responses (along with any objection to proceeding with the sentencing remotely) are due by March 16. This schedule was set in response to our initial request for an extension and adjournment dated January 25, 2021, which the Court granted that day (*see* Dkt. No. 351). That initial request was made in light of our understanding that the updated PSR would not be ready "until the first week of February, at the earliest" (*id.*).

We provided the probation office with Mr. Huberfeld's updated financial statements and medical records on February 4, and on February 18 we were informed by the assigned officer that the updated PSR should be ready by February 26. Since Fed. R. Crim. P. 32 entitles Mr. Huberfeld 14 days to raise any objections to the PSR (and adding an extra week in case finalizing the updated PSR takes longer than expected), we request an extension of the sentencing-related filing deadlines to on or after the following dates:

Friday, March 19, 2021: Deadline for the Parties' objections to the updated PSR and for the Parties' sentencing submissions; and

Friday, April 2, 2021: Deadline for the Parties' responses and for any objection to proceeding with the sentencing remotely.



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Under the proposed revised schedule, the Parties' briefing would be complete more than three weeks in advance of the April 26 sentencing hearing. The Government consents to this second request for extension of time.

Respectfully submitted,

/s/ Andrew J. Levander

Andrew J. Levander

LER

cc: All counsel of record, via CM-ECF